

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

RODNEY MCCRAY,)	
)	
Plaintiff,)	
)	
v.)	
)	CIVIL ACTION NO.
LIFE INSURANCE COMPANY OF)	2:06-CV-987-WKW
NORTH AMERICA; TYCO)	
INTERNATIONAL, INC.,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE

Plaintiff Rodney McCray and Defendants Life Insurance Company of North America (“LINA”) and Tyco International, Inc. (“Tyco” or collectively “Defendants”), by and through their undersigned counsel, jointly move the Court for an Order extending the current deadline for dispositive motions for a period of 60 days. In support of this motion, the parties state as follows:

1. On January 18, 2007, this Court entered a Scheduling Order which set the deadline for dispositive motions as June 13, 2007.

2. The parties have engaged in private settlement negotiations and made progress to date. The parties have now agreed to engage in formal mediation and believe that this matter can be resolved through mediation.

3. The parties would like to focus their efforts on settlement prior to expending additional resources in preparing cross-motions for summary judgment.

4. Accordingly, the parties request that the current dispositive motion deadline be extended by 60 days until August 10, 2007 to allow the parties to schedule and conduct mediation. No other dates on the Court's scheduling order would need to be extended. This brief extension of the dispositive motion deadline will facilitate the parties' settlement discussions and promote the efficient administration of justice.

WHEREFORE, the parties respectfully request an extension until August 10, 2007 for the dispositive motion deadline.

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